

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**SOVEREIGN PEAK VENTURES,
LLC,**

Plaintiff,

V.

**LG ELECTRONICS, INC., and
LG ELECTRONICS U.S.A., INC.,**

Defendants.

[illegible]

JURY TRIAL DEMANDED

CIVIL ACTION NO. 2:20-CV-00107-JRG

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO RESPOND TO AMENDED COMPLAINT**

Plaintiff Sovereign Peak Ventures LLC (“Plaintiff” or “SPV”) moves the Court to extend the time within which LG Electronics Inc. (“LGEKR”) and LG Electronics U.S.A., Inc. (“LGEUS”) (collectively, “LG Defendants”) are required to move, answer or otherwise respond to Plaintiff’s Amended Complaint. In so doing, the LG Defendants would not waive any defenses described or referred to in Rule 12 F.R.C.P. In support of this Motion, Plaintiff states as follows:

1. On April 14, 2020, Plaintiff filed its Complaint alleging patent infringement against the LG Defendants.
2. On May 7, 2020, Plaintiff filed its Amended Complaint alleging patent infringement against the LG Defendants.
3. Defendant LG Electronics Inc., a Korean company, has agreed to waive service under the Hague Convention in exchange for an extension of time for the LG Defendants to answer or otherwise plead by August 5, 2020.

4. The agreement between the Plaintiff and the LG Defendants regarding waiver of formal service should not be construed as a waiver of any other rights or defenses, including, for instance, the LG Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Plaintiff Sovereign Peak Ventures LLC respectfully request that the time in which the LG Defendants are required to move, answer or otherwise respond to Plaintiff's Amended Complaint be extended to and include August 5, 2020.

Dated: May 7, 2020

Respectfully submitted,

/s/ Patrick J. Conroy

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